



# Environmental Protection Agency

1701 S. First Street Maywood, IL. 60153

312/345-9780

Refer to: 03165002 - Cook County - Chicago/Republic Steel  
ILD056623598

RECEIVED

February 10, 1982

FEB 17 1982

Republic Steel  
11600 So. Burley  
Chicago, Illinois 60617

EPA Region 5 Records Ctr.



307705

E.P.A. — D.L.P.C.  
STATE OF ILLINOIS

Attn: W.J. Udovich

Dear Mr. Udovich:

On March 2, 1981, representatives of the Illinois Environmental Protection Agency (IEPA) conducted an inspection of Republic Steel. The inspection was conducted under the authorization of the United States Environmental Protection Agency (USEPA). The purpose of the inspection was to determine your facility's compliance status with the Resource Conservation and Recovery Act (RCRA) as amended. During the inspection the following deficiencies were observed:

The owner/operator is required to develop and follow a written waste analysis plan pursuant to 40 CFR 265.13(b). The owner/operator was not able to provide such plan at the time of the inspection as required by 40 CFR 265.13(b).

Pursuant to 40 CFR 265.15(b), the owner/operator must develop and follow a written schedule for inspection of all equipment and devices that are important to preventing, detecting or responding to environmental or human health hazards. At the time of the inspection, the owner/operator was not able to produce such an inspection schedule as required by 40 CFR 265.15(b).

The owner/operator must have a contingency plan at the facility. The contingency plan must address the actions to be taken by facility personnel in response to fires, explosions, or any unplanned release of hazardous waste or hazardous constituents to the environment. The plan must describe the arrangements agreed to by local police, fire departments, hospitals and emergency response teams. The names, addresses, and phone numbers of all persons qualified to act as emergency coordinators must be included in the plan. The contingency plan must list all emergency equipment at the facility, including the location, a physical description, and a brief summary of the capabilities of each item on the list. In facilities where evacuation could be necessary a plan describing evacuation routes and signals used to begin evacuation must be included in the contingency plan. These requirements are pursuant to 40 CFR Part 265 Subpart D. Your facility is deficient in that the contingency plan did not contain the following:

- 1) Steps to be taken by personnel to address the release of hazardous waste or hazardous waste constituents into the environment as required by 265.52(a).
- 2) Description of arrangements agreed to by local emergency authorities as required by 265.52(c).
- 3) A list of emergency equipment, its capabilities and location as required by 265.52(e).

At the time of the inspection manifests were observed to have the wrong hazard class or no hazard class on them as required by 262.21 (a 5).

During the inspection Republic Steel personnel said the electric furnace dust is stored in a surface impoundment. However, when IEPA was later supplied with a copy of the Part A submitted to USEPA it indicated the electric furnace dust was stored in waste piles. The inspection disclosed that although there had been a surface impoundment constructed it appeared as though the berming and surrounding land surface were comprised of the same material as in the surface impoundment.

You are hereby requested to submit to this office, within 15 days of receipt of this letter, a description of steps taken to correct the above deficiencies. Failure to correct these deficiencies may result in enforcement actions initiated by USEPA pursuant to 42 USC 6928. Please send your reply to the above address. Should you have any questions concerning this matter, please contact Mary Schroeder of my staff at the above number.

Sincerely,



Kenneth P. Bechely, Northern Region Manager  
Field Operations Section  
Division of Land/Noise Pollution Control

KPB:MWS:prb

Enclosure: Inspection Report

cc: ~~Division File~~  
Northern Region  
Region V, U.S. E.P.A.